

Dale Montgomery)	
)	Civil File No. 13-cv-2839- JNE/FLN
Plaintiff,)	
)	
v.)	
)	
Pinnacle Credit Services, LLC; Worldwide)	
Recovery; Stephens & Michaels Associates)	
Inc.; Royal Credit Union; Equable Ascent)	
Financial; Verifacts Inc.; Cavalry Portfolio)	
Svcs; Dynamic Recovery Services; NCO)	
Financial System, Inc.; Law Office of Joel)	
Cardis, LLC; North Shore Agency, Inc.;)	
Transworld Systems Inc.; Worldwide)	
Recovery Specialists Inc,)	
)	
Defendants.)	

COMES NOW Defendant Equable Ascent Financial ("EAF"), by and through its attorney, and hereby moves this Court, pursuant to Fed. R. Civ. P. 60(b), for an Order granting Defendant EAF relief from the default judgment entered against Defendant EAF on November 21, 2013 by vacating the judgment on the grounds that the judgment is void for lack of personal jurisdiction due to improper service of process. Said Motion is based upon the Memorandum, Exhibits, and all of the files, records, and proceedings herein.

Dated: December 4, 2013.

HINSHAW & CULBERTSON LLP

By: s/Michael T. Berger
Michael T. Berger Reg. No. 350679
333 South Seventh Street, Suite 2000
Minneapolis, MN 55402
Telephone: 612-333-3434
Fax: 612-334-8888
mberger@hinshawlaw.com

ATTORNEYS FOR DEFENDANT EQUABLE
ASCENT FINANCIAL